

**GCI Presentation – Triennial Review  
January 23, 2002**

- **No exemption or special forbearance from 251(c) is justified for Alaska.**
  - ACS Telephone Operating Co. revenue has increased since 1999. ACS is losing money in internet, LD and wireless.
  - Even in Anchorage, over 93% of GCI's customer lines traverse some part of ACS' loops (i.e. less than 7% is entirely over GCI facilities).
- **Evaluating impairment for switching – careful definition of “wire center” is necessary.**
  - Loops served by non-GR-303 capable IDLCs and other remote concentrators cannot be unbundled at the ILEC central office.
  - Juneau – 52% of loops cannot be unbundled at Juneau CO.
  - Fairbanks – 29% of loops cannot be unbundled at Fairbanks CO or other existing GCI collocation sites.
  - Any “wire center” density test for switch impairment must *exclude* all lines that cannot be unbundled at the “wire center,” and loops that are not “unbundlable” at the wire center are impaired as to switching and shared transport.
- **Promoting facilities based-entry requires performance measures and self-executing remedies (including liquidated damages).**
  - Liquidated damages must be sufficient to disgorge ILEC gains from discrimination.

# Interconnection

## Fairbanks, Ft. Wainwright, Eielson AFB, Juneau

Wire Center	POTS Service						Total Lines In Service
	Res Lines In Service	Bus Lines In Service	Analog Centrex	Digital Centrex	Key	PBX	
Globe	8,236	6,850	1,248	457	179	21	16,991
Greenwood	6,745	2,107	86	32	60	0	9,030
Steese	2,507	288	0	0	0	0	2,795
Goldstream	1,082	91	0	0	0	0	1,173
Aurora	760	211	30	9	6	0	1,016
Van Horn	60	731	0	0	0	0	791
Ester	746	96	13	0	0	0	855
Chena Ridge	838	58	0	0	0	0	896
Chena Pump	325	80	5	0	2	0	412
Dale Road	285	270	91	0	0	0	646
Sportsman	194	208	8	0	5	0	415
Lameeta	277	100	8	0	1	0	386
Wedgewood	254	66	0	0	0	0	320
Steel Creek	236	15	0	0	0	0	251
Miller Hill	177	42	1	0	0	0	220
East Ramp	6	146	17	0	1	0	170
Foxx	126	92	0	0	0	0	218
	<b>22,854</b>	<b>11,451</b>	<b>1,507</b>	<b>498</b>	<b>254</b>	<b>21</b>	<b>36,585</b>
North Pole	3,725	675	10	0	165	27	4,602
Chena 1	551	33	0	0	1	0	585
Chena 3	237	25	0	0	3	0	265
Freeman	159	13	0	0	0	0	172
Peedy	498	54	0	0	1	0	553
Lakloey	1,085	124	0	0	16	0	1,225
Bradway	342	32	0	0	10	0	384
Plack Road	410	18	0	0	0	0	428
Lyle Road	459	18	0	0	2	0	479
Conifer	420	15	0	0	0	0	435
Moose Creek	277	28	0	0	2	0	307
Harding Lake	257	36	0	0	0	0	293
Rozak Road	386	106	5	0	20	0	517
	<b>8,806</b>	<b>1,177</b>	<b>15</b>	<b>0</b>	<b>220</b>	<b>27</b>	<b>10,245</b>
Eielson AFB	<b>1,968</b>	<b>207</b>	<b>32</b>	<b>0</b>	<b>0</b>	<b>25</b>	<b>2,232</b>
Ft. Wainwright	880	152	23	0	11	9	1,075
Neely 1	483	12	0	0	5	0	500
Neely 2	253	6	0	0	1	0	260
Neely 3	535	18	0	0	1	0	554
Santiago 1	221	34	0	0	6	0	261
Santiago 2	437	8	0	0	5	0	450
<b>TOTALS</b>	<b>2,809</b>	<b>230</b>	<b>23</b>	<b>0</b>	<b>29</b>	<b>9</b>	<b>3,100</b>

# Interconnection

## Fairbanks, Ft. Wainwright, Eielson AFB, Juneau

Wire Center	POTS Service						Total Lines In Service
	Res Lines In Service	Bus Lines In Service	Analog Centrex	Digital Centrex	Key	PBX	
Juneau (Host)	2,702	2,070	615	121	421	152	6,081
Sterling	1,982	1,760	405	87	444	39	4,717
Mendenhall	2,849	249	17	0	5	0	3,120
Lemon Creek	1,481	458	171	51	93	17	2,271
Auke Bay	1,485	276	32	14	28	0	1,835
Douglas	1,424	152	17	34	9	0	1,636
Bonnie Brae	551	62	3	4	8	0	628
Salmon Creek	20	203	146	152	68	23	612
Trinity	499	37	2	0	3	0	541
Riverside	401	40	0	0	0	0	441
Thane Road	87	14	4	2	0	0	107
Lena Point	353	65	8	0	0	0	426
Mountain Side	207	16	0	0	0	0	223
<b>TOTALS</b>	<b>14,041</b>	<b>5,402</b>	<b>1,420</b>	<b>465</b>	<b>1,079</b>	<b>231</b>	<b>22,638</b>

#### **47 U.S.C. § 51.302 Performance Measurement and Assurance**

All agreements reached pursuant to section 252(b) shall include:

1. a mechanism for the incumbent LEC and the requesting carrier to monitor the incumbent LEC's provision of unbundled network elements and resold telecommunications services in accordance with the terms of the agreement, the requirements of sections 251, 252 and 258, and the Commission's rules; and
2. appropriate contractual enforcement mechanisms, including but not limited to self-effectuating liquidated damages payable to the requesting carrier, that will become effective if the incumbent LEC fails to perform in accordance with the terms of the agreement, the requirements of Sections 251, 252, and 258, and the Commission's rules, and be sufficient to disgorge from the incumbent LEC the benefits of its non-compliance.